

The Honorable Robert S. Lasnik

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAMES J. JACKSON III;  
KING COUNTY; STATE OF WASHINGTON )  
DEPARTMENT OF REVENUE; )  
JPMORGAN CHASE BANK, N.A.; and )  
BRIAN P. JACKSON, )

Defendants. )

Case No. 2:18-cv-01067-RSL

**STIPULATION FOR EXTENSION  
OF TIME TO ANSWER OR  
OTHERWISE RESPOND TO  
COMPLAINT AND ~~PROPOSED~~  
ORDER**

Plaintiff the United States of America ("United States"), by and through its undersigned counsel, and James J. Jackson, III, *pro se*, hereby stipulate as follows:

1. The United States commenced this action by filing a complaint on July 20, 2018.  
Dkt. # 1.
2. Service of process of the complaint, summons, and civil cover sheet upon James J. Jackson III was completed on August 1, 2018.
3. Based on the service date of August 1, 2018, the deadline for Mr. Jackson to respond to the complaint under Fed. R. Civ. P. 12(a)(a) is August 22, 2018.

1           4.     Mr. Jackson requires additional time to obtain information from his prior attorney  
2 in order to meaningfully respond to the complaint and requests a thirty (30) day extension of  
3 time to answer or otherwise respond to the complaint. The United States has no objection to this  
4 request for extension of time.

5           5.     Fed. R. Civ. P. 6(b)(1) authorizes this court to grant an extension of time to  
6 respond to a complaint for good cause shown. As the Ninth Circuit has recognized, Fed. R. Civ.  
7 P. 6(b)(1) "is to be liberally construed to effectuate the general purpose of seeing that cases are  
8 tried on the merits." *Ahanchian v. Xenon Pictures, Inc.*, 624 F.3d 1253, 1258-1259 (9th Cir.  
9 2010). Thus, in the absence of bad faith, requests for an extension before the applicable deadline  
10 has passed should normally be granted. *Id.*

11           6.     The extension requested in this stipulation is necessary not because of any  
12 dilatory action or unnecessary delay, but rather because of Mr. Jackson's efforts to provide a  
13 more complete response to the complaint.

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WHEREFORE, for good cause shown, the parties respectfully request that the Court approve this stipulation and allow Mr. Jackson an extension of thirty (30) days from August 22, 2018 or until September 21, 2018, to answer or otherwise respond to the complaint.

DATED this 17th day of August, 2018.

DATED this \_\_\_\_ day of August, 2018

RICHARD E. ZUCKERMAN  
Principal Deputy Assistant Attorney General

s/ Yen Jeannette Tran

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See next page for signature

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*Pro Se*

Of Counsel:

ANNETTE L. HAYES  
U.S. Attorney, Western District of  
Washington

*Attorneys for the United States of America*

### ORDER

The foregoing Stipulation for Extension of Time to Answer or Otherwise Respond to Complaint is APPROVED. IT IS SO ORDERED.

Dated this 4<sup>th</sup> day of Sept. 2018.

  
UNITED STATES DISTRICT JUDGE

1 WHEREFORE, for good cause shown, the parties respectfully request that the Court  
2 approve this stipulation and allow Mr. Jackson an extension of thirty (30) days from August 22,  
3 2018 or until September 21, 2018, to answer or otherwise respond to the complaint.

4 DATED this \_\_\_\_ day of August, 2018.

DATED this 17 day of August, 2018

5 RICHARD E. ZUCKERMAN  
Principal Deputy Assistant Attorney General

6  
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11 Of Counsel:

12 ANNETTE L. HAYES  
13 U.S. Attorney, Western District of  
Washington

14 *Attorneys for the United States of America*

16 **ORDER**

17 The foregoing Stipulation for Extension of Time to Answer or Otherwise Respond to  
18 Complaint is APPROVED. IT IS SO ORDERED.

19 Dated this \_\_\_\_ day of August, 2018.

21 UNITED STATES DISTRICT JUDGE